

1 CHRISTOPHER CHIOU
2 Acting United States Attorney
3 District of Nevada
4 Nevada Bar Number 14853
5 SHAHEEN TORGOLEY
6 Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Email: Shaheen.Torgoley@usdoj.gov
Attorneys for the United States of America

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 MARIO ABREGO,

13 Defendant.

Case No.: 2:18-cr-00223-APG-DJA

14 **ORDER TO CONTINUE THE**
15 **HEARING RE: MOTION TO DISMISS**
16 **COUNSEL**
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between CHRISTOPHER
18 CHIOU, Acting United States Attorney, and SHAHEEN TORGOLEY, Assistant United States
19 Attorney, counsel for the United States of America, and SHAWN PEREZ, counsel for
Defendant MARIO ABREGO, that the hearing regarding defendant's [53] Motion to Dismiss
counsel in the above-captioned matter, currently scheduled for August 18, 2021, at 1:00 p.m.,
be vacated and continued to August 23, 2021, at a time to be set by this Honorable Court.

20 This stipulation is entered into for the following reasons:

21 1. Today, the Court set a hearing for Mr. Abrego's motion to dismiss counsel for
August 18, 2021. Trial is set for November 29, 2021.

1 2. Government counsel, Assistant United States Attorney Shaheen Torgoley
2 anticipates being out of office from August 18, 2021 through August 20, 2021.

3 3. Mr. Abrego's present counsel, Shawn Perez, is available on August 23, 2021.

4 4. The parties agree to the continuance.

5 5. Defendant MARIO ABREGO is in custody and does not object to the
6 continuance.

7 6. The additional time requested by this stipulation, is allowed, with the defendant's
8 consent under the Federal Rules of Procedure 5.1(d).

9 7. This is the first request for a continuation of the hearing regarding defendant's [53]
10 Motion to Dismiss counsel.

11 DATED: August 5, 2021

12 Respectfully submitted,

13 CHRISTOPHER CHIOU
14 Acting United States Attorney

15 */s/ Shaheen Torgoley*

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SHAHEEN TORGOLEY
17 Assistant United States Attorney

18 */s/ Shawn Perez*

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SHAWN PEREZ
20 Counsel for Defendant MARIO ABREGO

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

VS.

MARIO ABREGO,

Defendant.

Case No.: 2:18-cr-00223-APG-DJA

ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the

Court finds that:

1. Plaintiff's counsel, Assistant United States Attorney Shaheen Torgoley will be out of district from August 18, 2021 through August 20, 2021.

2. A trial date complying with Speedy Trial Act parameters is set for November 29, 2021.

3. Defendant MARIO ABREGO is in custody and does not object to the continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested by this stipulation, is allowed, with the defendant's consent under the Federal Rules of Procedure 5.1(d).

6. This is the first request for a continuation of the hearing regarding defendant's [53] Motion to Dismiss counsel.

For all of the above-stated reasons, the ends of justice would best be served by a continuance of the hearing regarding defendant's [53] Motion to Dismiss counsel.

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ORDER

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IT IS THEREFORE ORDERED that the hearing regarding defendant's [53] Motion to
Dismiss counsel currently scheduled for August 18, 2021, at the hour of 1:00 p.m., be vacated
and continued to August 23, 2021, at the hour of 11:00 a.m. via video conference.

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The parties will receive a zoom invitation to appear.

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DATED this 6th day of August, 2021.

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THE HONORABLE DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

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